



June 22, 2005

VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Notice – WC Docket No. 04-36, 05-196

Dear Ms. Dortch:

On June 20, 2005, Stephen Meer, Chief Technology Officer of Intrado Inc. (“Intrado”) and the undersigned spoke telephonically with Julie Veach, Christi Shewman and others of the Wireline Competition Bureau to provide a progress report on Intrado’s deployment plan for VoIP/911 and to discuss Intrado’s product offerings.

Intrado shared with the Commission that it is moving forward to assist the VoIP Service Providers (“VSP”) with services and technologies that can help them meet the requirements of the Order. Intrado pointed out that the technology to satisfy the Order is currently available, albeit not widely deployed, and that deployments will become progressively easier and quicker as the implementation “firsts” are completed and work transitions from groundbreaking efforts to more leveraged rollout activities.

Intrado did enumerate a few challenges that we anticipate could affect the timely deployment of emergency services for VoIP subscribers in some areas of the country. For example, given the unique qualities of 911 and the expertise needed to not only deploy VoIP, but also wireline and wireless 911 solutions, carriers and other participants could face a scarcity of resources, which would be a limiting factor in the deployment progress for all involved entities. In addition, Intrado stated its concern that the rules surrounding specific implementation criteria and/or methods placed upon those entities interconnecting to the 911 network could potentially be a factor in the deployment of 911 functionality for some VoIP subscribers. As Intrado gains a better understanding of the requirements being imposed upon VSPs and third party providers, we will report our findings back to the Commission. Finally, Intrado pointed out that some Selective Routers across the country

may not have the capacity, or be readily expandable, to terminate the additional trunk quantities that may become necessary in support of this initiative. Specifically, we draw attention to older and/or smaller Selective Routers that may be operated by smaller telecommunications providers or government agencies.

Next, Intrado described its V911 Mobility Service solution to the Commission. The solution utilizes networked IP gateways to interface with the regional 911 systems and allows VSPs to hand 911 call traffic to Intrado for call vectoring, management of signaling and Automatic Location Information ("ALI") coordination and call specific delivery.

Intrado also indicated that it would have the ability to offer the VSPs a combination of solutions in order to meet the 120 day mandate. Intrado explained that in addition to the service broadly described above, technology exists to access Selective Routers via a Public Switch Telephone Network ("PSTN") access method. This method allows traffic to be presented to most types of Selective Routers via the PSTN for conversion to native 911 traffic, which is then delivered to the PSAP within the existing 911 framework. The PSTN access method is seen as a potential, quicker to implement stepping-stone to a gateway-supported, direct Selective Router access method in some situations. It is viewed as one possible mechanism to assist with transition, and Intrado did mention that while this technology has been successfully demonstrated in several trials around the country, in general this method has not been well received by the industry for a number of reasons and is not seen as a long term, viable solution in many cases.

Finally, Intrado informed the Commission that it is committed to working with all parties to meet the requirements of the Order, and it will continue to update the Commission as further specifics regarding deployment plans and rollout schedules are known.

Pursuant to Section 1.1206 of the Commission's rules, one copy of this notice is being filed electronically in the above-captioned proceeding.

Very truly yours,

/s/

Mary Boyd
Vice President Government & External Affairs